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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

ABDUL GHAZNAWI;

Plaintiff,

v.

SAN JOAQUIN COUNTY AND
SHERIFF DEPUTIES DOES 1-50

Defendants.

CASE NO. 2:22-cv-01988-MCE-KJN

**STIPULATION AND ORDER TO CONTINUE
SCHEDULING DEADLINES**

STIPULATION

Plaintiff ABDUL GHAZNAWI (hereinafter, "Plaintiff") and Defendant SAN JOAQUIN COUNTY (hereinafter, "Defendant"), by and through their respective counsel of record, hereby stipulate and request that the Court enter an order to continue the case management deadlines, set by this Court in a Scheduling Order entered on November 3, 2022. (*See* ECF No. 3.)

WHEREAS, pursuant to the Scheduling Order (ECF No. 3), fact discovery is to be completed by February 21, 2024, expert disclosures are to take place within 60 days after the close of fact discovery, and dispositive motions shall be filed within 180 days of the close of fact discovery.

WHEREAS, plaintiff's counsel, Stanley Goff, has been severely ill with Covid 19 and RSV for over several weeks and is still recovering at this moment.

WHEREAS, the parties have never previously requested a continuance of any of the deadlines contained in the Scheduling Order;

WHEREAS, the Court has not yet set an trial date in this matter;

WHEREAS, the parties have stipulated and agreed to a continuance of the discovery and related deadlines in this matter;

NOW, THEREFORE, the parties respectfully request that this Court extend the deadlines in this matter as follows:

Event	Current Deadline	Proposed Deadline
Discovery Cut-off	February 21, 2024	May 21, 2024
Expert disclosures	April 21, 2024	July 21, 2024
Rebuttal expert disclosures	May 21, 2024	August 21, 2024
Last day to file dispositive	August 21, 2024	November 21, 2024

Good cause exists for continuance of deadlines reflected above as required pursuant to Federal Rule of Civil Procedure Rule 16(b)(4) because circumstances beyond the parties control have significantly impacted the parties' ability to complete discovery, including significant scheduling challenges due to lead plaintiff's counsel's illness.

This is the parties' first request for continuance of case management deadlines.

1 IT IS SO STIPULATED.
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3 Dated: December 21, 2023

LAW OFFICE STANLEY GOFF

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5 By: /s/ Stanley Goff
Stanley Goff
6 Attorney for Plaintiff
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8 Dated: December 21, 2023

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10 By: /s/ Suli A. Mastorakos
11 Carl L. Fessenden
Suli A. Mastorakos
12 Attorney for Defendants
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ORDER

GOOD CAUSE APPEARING, the parties' stipulation is GRANTED. The following deadlines are CONTINUED and RESET as follows:

Event	Current Deadline	Proposed Deadline
Discovery Cut-off	February 21, 2024	May 21, 2024
Expert disclosures	April 21, 2024	July 21, 2024
Rebuttal expert disclosures	May 21, 2024	August 21, 2024
Last day to file dispositive	August 21, 2024	November 21, 2024

IT IS SO ORDERED.

Dated: January 2, 2024


MORRISON C. ENGLAND, JR.
SENIOR UNITED STATES DISTRICT JUDGE